

**United States District Court
Western District Of Texas
Austin Division**

Connor Elliott and Amanda Elliott,
individually and as next friend of N.E.,
their child and a minor,

Plaintiff,

v.

The United States of America,
Defendant.

No. 1:19-cv-427-LY

EXHIBIT 2

Defendant's List of Witnesses

I. Witnesses Expected to be Presented

Defendant the United States of America, by and through undersigned counsel, states that it intends to call the following witnesses at trial:

Dr. Michael D. Berkus, M.D. (expert, OB/GYN)

Dr. Sheldon Gross, M.D. (expert, pediatrics/neurology)

Darius Y. Garcia, RN, BSN (expert, life care planner)

II. Defendant Reserves the Right to Call

Any witnesses disclosed, designated, and/or called at trial by Plaintiff or Defendant.

Any witness to be used for impeachment only.

Dated: October 14, 2020

Respectfully submitted,

GREGG N. SOFER
United States Attorney

By: /s/ Kartik Venguswamy
KARTIK N. VENGUSWAMY
Assistant United States Attorney
State Bar No. 24110801

KRISTINA BAEHR
Assistant United States Attorney
State Bar No. 24080780

U.S. Attorney's Office
903 San Jacinto Blvd., Suite 334
Austin, Texas 78701
(512) 370-1294 (phone)
(512) 916-5854 (fax)
kartik.venguswamy2@usdoj.gov
kristina.baehr@usdoj.gov

**ATTORNEYS FOR DEFENDANT
UNITED STATES OF AMERICA**